

FDA Staff Manual Guides, Volume III – General Administration

Financial Management

Travel

Government Travel Charge Card Program and ATM Advance Program

Effective Date: 05/31/2022

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## 1. Purpose.

This Staff Manual Guide (SMG) will provide instructions regarding the use of the Government Travel Charge Card Program.

## 2. Background.

General Services Administration (GSA) established the travel charge card program to procure transportation services and pay for per diem and other allowable travel related expenses incurred during official travel. The goal of the program is to reduce Food and Drug Administration (FDA) cash requirements by diminishing the need for travel advances and improving internal controls, cash management, and administrative procedures. The travel charge card is a privilege for FDA employees, and employees must follow the policies and procedures outlined in this guide.

In 2018 GSA rescinded the requirement that employees perform Temporary Duty a particular number of times to be approved for an Individual Billed Account (IBA) Travel Card.

It is now recommended that an IBA Travel Card be issued if an employee travel once. This promotes the overall readiness of the Department and its Operational Divisions.

Two Exemptions – Special Government Employee Travelers & Invitational Travelers

It is a requirement for all Commissioned Corp Officers to apply for the card in preparation for deployments.

### **Mandatory Use of the Government Travel Card While on Official Travel**

In accordance with FTR §301-70.70, **any employee who goes on official government travel must have a government travel charge card** and all travel expenses are to be charged to either an Individual Billed Account (IBA) or Centrally Billed Account (CBA) government travel card. Personal cards are not authorized for use for Official Government Travel. This regulation will further prescribe the policies and procedures governing the Food and Drug Administration (FDA) Travel Charge Card Program. The travel card must be used as a method of payment for all travel related expenses (FTR § 301-51.1)

## 3. Reference/Authority

FDA policy is consistent with guidance set forth by the following policies regarding the use of the Government Travel Charge Card Program and ATM Advances while on official business. These include:

- A. Department of Health and Human Services Travel Policy Manual, revised 2018 (<https://fda.sharepoint.com/sites/OC-Intranet-OC-OO-OFBA-FMM/file/Forms/AllItems.aspx?id=%2Fsites%2FOC%2DIntranet%2DOC%2DOO%2DOFBA%2DFMM%2Ffile%2FHHS%20Travel%20Policy%20Manual%5F2018%20Q4%2Epdf&parent=%2Fsites%2FOC%2DIntranet%2DOC%2DOO%2DOFBA%2DFMM%2Ffile&p=true&wdLOR=c62F00394%2D9E87%2D4A95%2D9881%2D5B5C06AB3509&ct=1644877077785&or=Outlook-Body&cid=CBAEA902-0CD1-408B-BB2A-3FA7FFA7E516>).
- B. Government Charge Card Abuse Prevention Act of 2012, Public Law 112-194, Section 3 (<http://www.gpo.gov/fdsys/pkg/PLAW-112publ194/pdf/PLAW-112publ194.pdf>).
- C. The Travel and Transportation Reform Act of 1998, P.L. 105-264, 112 Stat. 2350 ([H.R.930 - 105th Congress \(1997-1998\): Travel and Transportation Reform Act of 1998 | Congress.gov | Library of Congress](https://www.congress.gov/105/legislation/house-bills/930)).
- D. Federal Travel Regulations (FTR), 41 CFR Parts 301-51, 301-52, 301-54, 301-70, 301-71, and 301-76 (<https://www.gsa.gov/policy-regulations/regulations/federal-travel-regulation/federal-travel-regulation-and-related-files>).
- E. GSA SmartPay3 Contract (<https://smartpay.gsa.gov/sites/default/files/SP3%20Master%20Contract%20%28Generic%29%20thru%20Mod%20PS-03%20-%20Sep%202018.pdf>).
- F. “Prompt Payment”, 5 CFR Part 1315 RIN 0348-AB47 (<https://www.fiscal.treasury.gov/files/prompt-payment/5cfr1315.pdf>).
- G. “Standards of Ethical Conduct for Employees of the Executive Branch,” 5 CFR Parts 2635 (<http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=06f812f26e7ed9f364bb87944757b912&rgn=div5&view=text&node=5:3.0.10.10.9&idno=5>).
- H. “OMB Circular A-123 Appendix B, A Risk Management Framework for Government Charge Card Program” (<https://www.whitehouse.gov/wp-content/uploads/2019/08/Issuance-of-Revised-Appendix-B-to-OMB-Circular-A-123.pdf>).

#### 4. Definitions.

- A. **Agency/Organization Program Coordinator (A/OPC)** – Agency-designated coordinators, including alternates, who serve as the point of contact for and administer the travel charge card program. A/OPCs are

assigned a hierarchy level based on their location and responsibility scope.

1. Level 1 – Citibank Coordinator
2. Level 3 – FDA Coordinator
3. Level 4 – Center Coordinator
4. Level 5/6 – Sub-Center Coordinator

- B. **Automated Teller Machine (ATM) Advance** – Monies obtained from a travel charge card via ATM or bank teller, which is used to cover anticipated out-of-pocket, incidental travel expenses, such as ground transportation or occasional meals, that cannot be purchased with the travel charge card while on travel.
- C. **Billing Error** – Transactions appearing on a cardholder's account as questionable charges, duplicate billings, or unauthorized charges.
- D. **Cancellation** – Permanent termination of travel charge card privileges.
- E. **Cardholder** – The legal agent (employee) using the travel charge card to buy goods and services in support of official travel and Government business. The cardholder holds the primary responsibility for the card's proper use and payment.
- F. **Cardholder Statement** – A statement, listing all transactions during the billing period, which is sent to each cardholder.
- G. **Cash Advance** – The estimated travel expenses prepaid to an employee who does not have a travel charge card. Cash advances must be obtained in limited amounts commensurate with actual travel. The standard amount is 60 percent of the meals and incidental expenses (M&IE) for the TDY location.
- H. **Cash Limit Per Cycle** – The overall cash limit on a travel IBA determines the total cash a cardholder can withdraw per monthly cycle.
- I. **Centrally Billed Account (CBA)** – A card or account established by the travel charge card vendor. Payments are made directly to the charge card vendor by the FDA office responsible for the reconciliation of the account.
- J. **CitiManager** – The travel charge card vendor's internet-based system,

which provides a variety of reports related to the travel charge card program. The reports assist in the effective management of the travel charge card program.

- K. **Delinquency/Delinquent Account** – An undisputed travel charge card account balance that remains unpaid for more than 61 days past the statement date in which the unpaid charges first appeared.
- L. **Dispute** – A written challenge of an unresolved or disputed transaction on the cardholder’s billing statement. Cardholders must assert a dispute in writing within 60 days of the date of the statement reflecting the transaction in question in order not to be liable for payment of the transaction in question.
- M. **Fair Isaac Credit Organization (FICO) Score** – A standard credit score which produces a substantial portion of a credit report that credit bureaus sell to lenders, so they can assess an applicant's credit risk and whether to extend the applicant credit.
- N. **Inappropriate Use** – Not suitable or proper in the circumstance. Charges not associated with official travel.
- O. **Individual Billed Account (IBA)** – A government contractor-issued travel charge card, which is used by a government employee, to pay for official travel and transportation-related expenses for which the FDA employee is liable to pay.
- P. **Manual Payment** – A manual payment is a payment that is not initiated from the FDA’s financial system, Unified Financial Management System (UFMS). Instead, payments are entered and processed using Treasury’s Secure Payment System (SPS) prior to an invoice being created in UFMS. This payment should be recorded in UFMS as a clearing payment.
- Q. **Merchant Category Code (MCC)** – A numerical identifier assigned by the bank and validated by the supplier for classification of products and services.
- R. **Misuse of Government Issued Travel Charge Card** – Use of the travel charge card in an unauthorized, illegal, or adverse manner. Examples of misuse include unauthorized cash advances, purchase of non-reimbursable personal expenditures, use of the travel charge card when not in an official travel status, and becoming delinquent in payments to Citibank.

- S. **Official Temporary Duty (TDY) Travel** – Written, approved authorization to travel on official business for the Federal Government that will result in reimbursement for expenses on a travel voucher.
- T. **Past Due** – A travel charge card account balance that is unpaid for 16-24 days past the closing statement date.
- U. **Pre-cancellation** – Pre-cancellation begins at 90 days past due. Accounts will be unavailable for use.
- V. **Pre-Suspension** – Pre-Suspension begins at 25 days past due. ATM withdrawal access is suspended but transactions will still process.
- W. **Restricted Card** – A travel charge card which has a lowered credit limit of \$5,000 and no authorized ATM cash withdrawal allowance. Employees who refuse the credit worthiness check or do not pass the credit worthiness check at the time of application will receive a restricted card.
- X. **Split Disbursement** – Split disbursement divides a travel voucher reimbursement between the travel charge card vendor and the traveler. FDA mandates the use of split disbursement for all travel charge cardholders.
- Y. **Suspension** – The temporary termination of travel charge card privileges. Temporary card suspension begins at 31 days past due for IBAs and 55 days past due for CBAs.
- Z. **Travel Charge Card** – A bank-issued Government credit card used solely for official Government travel.
- AA. **Travel Management Center (TMC)** – A service for booking common carriers (e.g. air, rail, and bus confirmations and seat assignments), lodging accommodations, and car rental services; fulfilling reservations (i.e. ticketing); providing basic management information on those activities; and meeting other requirements as specified in FTR 30173.106. A travel management service may include a travel management center (TMC), Commercial Ticket Office (CTO), an electronically available system, or other methods of arranging travel.
- BB. **Unauthorized Use** – Not having official permission or approval. Charges not associated with official travel.
- CC. **Unrestricted Card** – A travel charge card which has the agency-standard credit limit of \$12,500.

DD. **Visa IntelliLink Compliance Manager** – A spending management system for FDA to manage cardholder expenditures and complete reporting on one single platform across multiple geographies.

EE. **Voucher** – A written request, supported by documentation and receipts where applicable, for reimbursement of expenses incurred in the performance of official travel.

## 5. Policy.

### A. General Overview of Travel Charge Card Program

Employees who meet the Federal Travel Regulations (FTR) requirements for issuance of the card are required to use the travel charge card. The use of the travel charge card is limited to expenses incurred in conjunction with official travel while on Temporary Duty (TDY). The provisions of this policy apply to all FDA civil service employees and commissioned corps officers who have been issued or are applying for a travel charge card.

Use of the travel charge card allows employees to take advantage of federal discounts at hotels and car rental companies. Some lodging facilities will not honor the tax-exempt form unless the employee is paying for lodging with a travel charge card.

### B. Qualification for Obtaining a Travel Charge Card and Travel Charge Card Application

Employees who travel on official government business are required to apply for and use the travel charge card. Cardholders must use the travel charge card to perform official travel and for all official travel expenses.

#### 1. Travel Charge Card Issuance

Employees who do not currently have a travel charge card may apply for the card through the employee's Level 4 or lower A/OPC.

Before employees are issued a travel charge card, the following documents must be submitted by the employee to the Level 4 or lower A/OPC:

- a. Certificate of completion of the DHHS travel charge card training taken within six (6) months prior to applying for travel charge card.

The Commissioner, Deputy Commissioner, and Chief of Staff can meet this requirement by either taking the DHHS travel charge card training or through a briefing (in person or virtual) by the Senior Travel Officer (STO), Deputy Senior Travel Officer or the Director of Travel Services

- b. Signed HHS Traveler's Agreement for Government Contractor – issued Travel Charge Card Users
- c. Signed FDA Zero Tolerance Policy Memo
- d. Completed online travel charge card application

## 2. Travel Charge Card Limits and Credit Worthiness

Effective January 22, 2007, pursuant to Section 639 of the Consolidated Appropriations Act, 2005 (P.L. 108-447) as referenced in the Circular, all employees applying for a travel charge card must use the Citibank form that requires the applicant to initial their agreement/refusal for a credit score check prior to issuance of a travel charge card. An employee with a FICO score below 660 or who refuses to permit a credit score check, will be issued a restricted travel charge card. A restricted travel charge card will have a lower credit limit than the FDA standard credit limit and will not have any ATM withdrawal capability.

Cardholders can request a credit score check or a new credit score check if they feel they are in a better credit standing than at the time of the original application.

Only the bank will see the credit data. An employee issued a restricted card due to a FICO score below 660 may contact the credit bureau if they believe that there is an error. There will be no fee charged by Citibank for the credit score check.

## C. Use and Management of the Travel Charge Card

### 1. Travel Charge Card Use

The travel charge card will be employed whenever and wherever possible for airline and other common carrier transportation services, hotel/motel, restaurant, automobile rental, gasoline, and other expenses incurred while on official travel. Use of the card



does not relieve the cardholder of the responsibility to employ prudent travel practices and to observe the rules and regulations governing travel as set forth in the FTR, the DHHS Travel Policy Manual, the FDA Zero Tolerance Policy, and agency-specific policies and procedures. Cardholders should follow the guidance in the DHHS Travel Policy Manual, Section 10.3.5.2 Use of the Travel Charge Card, when using their travel charge cards.

FDA restricts most MCC's that offer services and/or products that are non-travel related expenses. As a precautionary measure for those merchants who are misclassified within the travel charge card program, cardholders are prohibited from use of their travel charge card to procure the items listed in the DHHS Travel Policy Manual, Section 10.3.5.2, as well as the following additional items:

- a. Alcohol;
- b. Movie rentals;
- c. Copy/fax services;
- d. International visa purchases;
- e. Government-owned vehicles gas, supplies, or expenses (See SMG 2173.1);
- f. Registration fees;
- g. Sample purchases.

## 2. Exemptions to the Use of the Travel Charge Card

Exemptions can be found in the DHHS Travel Policy Manual, Section 10.3.5.3 GSA has exempted the following official travel expenses and/or classes of employees from the mandatory use of the travel charge card:

- a. Classes of Employees
  - 1) When an employee has an application pending for the travel charge card
  - 2) Any employee who is not eligible to receive a Government contractor-issued travel charge card. (i.e. card was closed for

reasons besides frequency of travel)

- 3) When individuals are traveling on invitational travel orders on behalf of another Government Agency or another OpDiv/StaffDiv;

b. Types of Expenses

- (1) Expenses incurred at a vendor that does not accept the Government travel charge card
- (2) Laundry/dry cleaning;
- (3) Parking;
- (4) Local transportation systems;
- (5) Taxi (Only if they do not accept credit cards);
- (6) Meals (when use of the card is impractical, for example, group meals or when the travel charge card is not accepted);
- (7) Phone calls (when a Government calling card is available for use in accordance with FDA policy);
- (8) Relocation allowances except for enroute travel and house-hunting trips.

3. Improper Use of the Travel Charge Card

The travel charge card must only be used for official transportation and travel-related expenses while in TDY. Cardholders must not use the travel charge card to make personal purchases or ATM advances for personal use. Examples of improper use of the travel charge card include:

- a. Making personal purchases or ATM advances for expenses which are not related to official travel;
- b. Failure to pay, or pay in a timely manner, bills for official travel expenses even in the absence of submitted/processed travel vouchers or receipt of reimbursement for travel expenses;
- c. Failure to use the travel charge card for travel-related expenses which are not exempt by regulation or policy;

- d. Failure to pay, or pay in a timely manner, unauthorized or personal expenses;
- e. Failure to properly secure and/or safeguard the travel charge card to prevent misuse by other individuals, including co-workers, family members, and/or friends;
- f. Obtaining or permitting issuance of a travel charge card under false pretenses and/or when there is no official need to travel.

#### 4. Travel Voucher Reimbursement

- a. Cardholders must prepare and submit a travel voucher to their AO, with required receipts, within five (5) working days after completion of a trip or period of travel or every 30 days if on continuous travel status.
- b. Cardholders will be reimbursed for travel and travel-related expenses authorized and allowable under the FTR and FDA-specific policies.
- c. DHHS has mandated the use of split disbursement which means that the approved travel voucher reimbursement between Citibank and the cardholder will be processed separately. Travel card charges made for official travel expenses will be reimbursed to the contracting bank, while approved expenses will be reimbursed to the traveler.
- d. Cardholders must monitor bank statements in order to verify payments were made by split disbursement.
- e. Any remaining balances on the travel charge card must be paid immediately by the cardholder.
- f. The use of personal funds to finance all travel expenses (except transportation tickets) on official travel is authorized when an employee's travel charge card account has been cancelled. When personal funds are used, employees will be reimbursed for qualifying travel expenses by submitting a proper travel voucher.
- g. Receipts for local transportation expenditures are generally not required, except for any single expense costing over \$75. However, receipts are required for all lodging including hotel taxes, air, rail transportation, regardless of amount in accordance with Section 5.2.1 Reimbursable Miscellaneous Expenses. In addition, you may be required to provide receipts under \$75 on case-by-case basis at the request of the AO, as allowed by the FTR in section 301-52.8.

Original receipts must be kept by the traveler for two (2) years.

5. Responsibility to Pay Travel Charge Card Bills in Accordance with Cardholder Agreements

Cardholders are responsible for reading and adhering to the policies and procedures specified in the cardholder agreement in order to obtain a travel charge card. Under the cardholder agreement, the travel charge card bill is due and payable in full when delivered to the cardholder.

The employee is liable to Citibank for full reimbursement of all charges authorized by the cardholder except as described below in section 5.C.6 Disputed Charges.

Under FTR 301-52.24, cardholders must pay the amounts owed to Citibank in accordance with the cardholder agreement, even if the cardholder has not yet been reimbursed for those expenses appearing on the billing statement. Cardholders are expected to comply with this guidance by promptly resolving any outstanding balance on the travel charge card account.

6. Disputed Charges

The cardholder agreement informs cardholders about how to handle disputed charges on a travel charge card bill.

- a. Cardholders are required to dispute any charges directly with Citibank within 60 days of the statement date on which the original transaction appears. Disputed transactions request after 60 days will not be reviewed by CitiBank. In this case, the cardholder must contact the vendor to rectify the dispute. See Appendix C for more information on how to submit a dispute.
- b. Once Citibank receives the disputed charge(s), they will issue a temporary credit to the cardholder's account while the dispute is being researched.
- c. While the bank is conducting this investigation, the cardholder does not need to pay the amount of the disputed charge and it will not be considered past due.
- d. The cardholder's travel charge card will not be temporarily closed for unpaid disputed charges.

- e. Cardholder's will receive a "Rebill" if the following occurs:
  - (1) Citibank was not provided the proper information from the Cardholder disputing the item or the Agency/Organization's representative, if disputing the item on the Cardholder's behalf.
  - (2) The Supplier/Merchant issues the Cardholder a credit after Citibank credited the disputed charge from the outstanding balance due when receiving notice of the dispute (known as a provisional or conditional credit).
  - (3) The Association (VISA) rules against the dispute case, in favor of the Supplier/Merchant after a chargeback was processed. Below is a high-level overview of the VISA chargeback process and identifies when a rebill could occur.

#### 7. Lost or Stolen Cards

- a. If a travel charge card is lost or stolen, the cardholder must contact Citibank first at: 800-790-7206 and their Level 4 or lower A/OPC immediately to make them aware of the situation.
- b. Cardholders must not write their PIN on their travel charge card or store the card anywhere that is not a secured location.
- c. To avoid unauthorized withdrawals, cardholders should notify Citibank and their Level 4 or lower A/OPC at once if they suspect that their PIN has been compromised.

#### D. FDA Zero Tolerance Policy

The objective of the FDA Zero Tolerance Policy is to eliminate misuse and abuse in the travel charge card program so that it does not become necessary to impose disciplinary actions on any FDA employee. Proper use of the travel charge card eliminates the need to cancel travel charge card privileges, reducing the administrative burden of taking action against employees, lessens the stress for all involved, and preserves the reputation of FDA and its employees to achieve its mission and goals with integrity. This regulation sets forth any inappropriate charges and delinquencies. The following misuses of the card are strictly prohibited:

1. Unauthorized charges and charges not associated with official travel, such as personal and family member use of the card. Additional prohibited activities are listed in Section 5.C.3 of this regulation.
2. Shared use of the card with another employee for official travel purposes.
3. Cardholder permits the travel charge card account to become delinquent.
4. Failure to use the card while on official travel unless there is an exemption.
5. Failure to pay accounts with sufficient funds.
6. Failure to properly use Government voucher reimbursements to repay travel expenses.
7. Excessive cash advances, or cash advances not commensurate with official travel.

The Agency Assistant Commissioner (OC/OM), as described in the Code of Federal Regulations 21 C.F.R. §10.3, may exempt any payment, person, type or class of payments, or type or class of agency personnel from the use of the travel charge card, if the exemption is determined to be necessary in the interest of the FDA. For a list of Exempted Agency Employees and Types or Classes of Payments, please refer to the DHHS Travel Policy Manual, Section 10.2. GSA must be notified in writing within 30 days after granting the exemption, stating the reasons for the exemption. A copy of the exemption must also be forwarded to the Level 3 A/OPC.

The spending limits issued on travel charge cards are based on the results of an employee's credit worthiness assessment and must be in accordance with the needs of each cardholder. An Agency-wide default limit is set at \$12,500 for an acceptable credit rating or \$5,000 for a lower credit rating (ratings are based on GSA's predetermined FICO score limits) for most travel charge cards. These limits will apply to all new cards unless FDA management can justify a higher amount. Memoranda regarding this matter shall be sent to and approved by the Level 3 A/OPC.

Possession and use of the travel charge card do not relieve the employee from observing rules and regulations governing official travel, including use of Government city-pair contract carriers,

American Flag carriers, Government car rental agreements, Government approved lodging facilities, or the Travel Management Center.

Improper, fraudulent, abusive, or negligent use of a travel charge card is prohibited. Appropriate FDA personnel, with the advice of the Office of Human Resources, may impose appropriate corrective actions, including removal in certain cases, for employees who are negligent or engage in misuse, abuse, or fraud with respect to the travel charge card. Appropriate FDA personnel may impose, but are not limited to, the following administrative and/or disciplinary actions for delinquencies, misuse, and/or abuse:

- a. Issue a letter of counseling to the employee;
- b. Temporarily close or cancel employee accounts;
- c. Issue a letter of reprimand to the employee;
- d. Five (5) day suspension; and
- e. Impose additional disciplinary actions deemed appropriate by the Agency.

The circumstances of each individual case should be considered when determining the appropriate type of corrective or disciplinary/adverse action. Consult the HRM, "Instruction 752: Disciplinary and Adverse Actions" for further guidance. No FDA Official has the authority to override Citibank's policy regarding the suspension or cancellation of cardholder accounts.

#### E. Administrative and Disciplinary Actions

Accounts may be temporarily closed or cancelled by the FDA for reasons such as delinquency, misuse, or abuse. Citibank may also close an account due to cardholder delinquency and suspected misuse. Citibank will initiate cancellation due to non-payment at 96 days of the billing cycle date for which an unpaid and undisputed charge first appeared.

Level /3 A/OPC may also close an account for non-usage by the cardholders. Lower level A/OPCs may request through Level 3 A/OPCs that an account be closed.

##### 1. Infrequent Travelers

Infrequent travelers should contact their Level 4 A/OPC to determine the status of their travel charge card for subsequent trips. Cardholders with a temporarily closed travel charge card will need to contact their Center A/OPC at least 72 hours prior to travel commencement to have their travel charge card reactivated.

Travelers with closed travel charge card accounts must reapply for a card if it becomes necessary for them to have an active card.

For information about travel charge cards for employees involved in disaster relief and emergency response services, refer to the DHHS Travel Policy Manual, Section 10.3.6.2.

## 2. Cardholder Accounts with Delinquent Payments

In accordance with their cardholder agreement, cardholders are obligated to pay the undisputed balance no later than 30 days after the end of the billing cycle date. An undisputed charge card account balance that is unpaid for more than 61 days past the statement date is considered delinquent.

- a. An undisputed charge card account is past-due at 16 days past the last statement cycle due date. The account will remain open for use with no ATM refresh privileges;
- b. Pre-Suspension begins at 25 days past the statement due date. Although the travel charge card remains open, cardholders will no longer be eligible to make ATM withdrawals until past due balance is paid;
- c. Suspension begins at 31 days past due for IBAs and 55 days past due for CBAs. The travel charge card will be unavailable for use;
- d. Pre-cancellation of travel charge card accounts will begin at 90 days past due. Accounts will remain unavailable for use; and
- e. Travel charge cards will be cancelled at 96 days past due.

In addition to the conditions listed above, a cardholder will have their account cancelled and be prohibited from further charges if either of the following conditions occurs:

- a. The travel charge card has been suspended two times during a 12-month period for non-payment of undisputed principal amounts and is past due again;



- b. The account has had payments for which non-sufficient funds were available two times during a 12-month period.

### 3. Reinstatement of Cardholder Accounts due to Delinquency

Individual cardholder accounts which have been temporarily closed or cancelled by Citibank due to delinquency can only be reinstated by Citibank. In order for an account to be reinstated, the following criteria must be met:

- a. The account must have a zero balance. The last payment must have been posted for 10 days, or it is noted that the payment was a money order or cashier's check;
- b. The account activity must have been 60 days past due less than twice within the last 12 months;
- c. The account activity must reflect less than two non-sufficient funds checks within the last 18 months and no non-sufficient funds checks within the last six months;
- d. The individual must have a satisfactory personal credit history as evaluated by Citibank;
- e. If the cardholder account has been cancelled due to delinquency.

Application for card reinstatement requires a one-year waiting period after account closure or payment of principal amount and subsequent delinquency fees. Requests for card reinstatement requires Level 3 A/OPC review and approval before approved requests are submitted to Citibank.

### 4. Cardholder Accounts with Misuse and Abuse

Suspected cases of card misuse, abuse and/or fraud will be referred to FDA's Office of Internal Affairs and HHS Office of Inspector General for investigation. Circumstances surrounding each case of card misuse, abuse and/or fraud will be considered when determining the proper type of corrective or disciplinary actions imposed on cardholders. When a cardholder is found liable for an improper purchase, the FDA, pursuant to the Charge Card Abuse Prevention Act of 2012 shall take steps to recover the cost to: (a) reimburse the government and (b) be subject to the following disciplinary actions:

- a. Initiate verbal counseling and warning; provide written warning; suspend or revoke card privileges;
- b. Suspend or revoke employee security clearance;
- c. Include misuse occurrence in employee performance evaluations;
- d. Suspend or terminate employment;
- e. Ensure consistent enforcement of penalties; and

Cardholders who have lost their travel charge card privileges due to card cancellation, or misuse will not be authorized for travel advances. Travelers who need to perform official travel must charge their common carrier transportation to the FDA centrally billed accounts. All other travel-related costs must be paid by the traveler using personal funds.

#### 5. Reinstatement of Cardholder Accounts due to Misuse and Abuse

Upon inferred investigative findings of individual cardholder accounts which have been closed or cancelled due to card misuse and abuse, the process of reinstatement of cardholder accounts are as follows:

- a. Cardholder accounts where unintentional misuse and abuse has been found, will be reinstated with a one-year probationary period where all transactions will be monitored;
- b. Cardholder accounts where intentional misuse and abuse has been found, will be cancelled indefinitely with no period of reapplication.

Requests for card reinstatement requires Level 3 A/OPC review and approval before approved application requests are submitted to Citibank.

#### F. ATM Advances for Travel

A cardholder may use the travel charge card to obtain ATM advances for the exempted expenses described in the DHHS Travel Policy Manual, Section 10.3.5.3 if authorized in advance by his/her supervisor. ATM advances are used to cover anticipated out-of-pocket incidental travel expenses, such as ground transportation or occasional meals, which cannot be purchased with the travel charge card.

Only travelers with an unrestricted travel charge card will be able to

obtain an ATM advance using their travel charge card. Cardholders are expected to obtain ATM advances using the travel charge card and will not be permitted to obtain a cash advance from FDA.  
Approval for and Withdrawal of ATM Advances

ATM advances are to be obtained for authorized Government travel only. The approved travel authorization should indicate that an ATM advance is authorized and specify the maximum amount to be obtained.

ATM advances should be withdrawn no more than two (2) business days prior to the trip. FDA will reimburse cardholders for service fees incurred for ATM advances. Cash obtained from the ATM in amounts greater than required for the travel duration are considered excessive cash advances and are subject to disciplinary action in accordance with FDA policy. Actual use of the travel charge card may be verified from the reports available to all A/OPCs.

ATM withdrawals may be made at a point convenient to the cardholder such as permanent duty station, TDY location, or enroute, while on official travel. However, inappropriate locations such as liquor stores or gambling sites are not allowed.

Cardholders must also be cognizant of their destination's political climate and environment to ascertain whether large sums of cash can safely be in their possession.

#### 1. Vouchering for ATM Advances

When an ATM advance is obtained, the receipt must be retained to be included with the travel voucher.

In addition, the amount of the ATM transaction fee should be indicated on the travel voucher if the financial institution and/or network assess a surcharge for use of their ATM. These surcharges will not appear as itemized charges on the cardholder's monthly statement but will instead be included as part of the amount withdrawn for a given transaction. Cardholders should include the surcharge on their travel voucher.

Claims for ATM fees will not be allowed when:

- a. The travel authorization does not authorize an ATM withdrawal;
- b. Withdrawals exceed the amount authorized;

- c. Withdrawals are made day after employee completes official travel.
- d. The voucher does not indicate and show approval for an emergency withdrawal and no other ATM authorization exists on the travel authorization.

If the cardholder withdrew an ATM advance before the travel was subsequently cancelled, the cardholder is responsible for paying the amount back to the card account. If the cardholder incurred an ATM fee, the cardholder should submit a claim for reimbursement explaining the circumstances of the trip cancellation. A copy of the travel authorization and cancellation should be attached.

ATM advances should be reduced by the amount of expenses that will be charged directly to the travel charge card or to the travel voucher claim.

## 2. Advances for Travelers with Cancelled Cards

A cancelled travel charge card account reflects unfavorable past performance and will be reported to the cardholder's credit organization. For this reason, employees with cancelled travel charge card accounts are considered high risk in the repayment of travel advances. In the case of extreme hardship, employees who have lost their travel charge card privileges may request written approval for a cash advance on a trip-by-trip basis from their Center/Office Chief Executive Officer, who may re-delegate this authority to a level not lower than the Senior Travel Officer of the FDA. Consideration of such requests will be made on a case-by-case basis, and approval should not be assumed. A written record of all such approvals, as well as the basis for each approval, will be maintained by the Center requesting the advance and the Level 3 A/OPC. The Office of Inspector General (OIG) shall review these records during program specific audits.

## 6. Responsibilities.

The primary roles and responsibilities for the policy directives and required procedures within this chapter are as follows:

### A. Responsibilities of the Center/Office Chief Executive Officer

- 1. Review and provide approval for requests and supporting documentation from the cardholder for requests for temporary ATM withdrawal, and/or temporary restricted or unrestricted card limit increase.

## B. Responsibilities of the Level 3 A/OPC

1. Complete travel charge card training and recertify every year;
  - a. Maintain a file of certificates of completion for all Level 4 A/OPCs one level lower.
2. Use the online reporting capabilities in CitiManager and Visa IntelliLink Compliance Management to monitor for cardholder delinquency and potential travel charge card misuse and abuse.
  - a. Create cases in Visa IntelliLink to research possible abuse/misuse.
  - b. Temporarily close (Closed-Misuse Status) accounts in CitiManager during the misuse/abuse investigation (the account will not be closed if the cardholder is in travel status).
  - c. Reopen accounts in CitiManager upon receipt of misuse/abuse justification.
  - d. Review and adjudicate cases based on the justification provided by the cardholder within 15 days of receipt.
  - e. Forward cases of critical abuse/misuse and non-compliance to the Office of Criminal Investigations/Office of the Inspector General for further review and investigation.
  - f. Monitor Level 4 and lower A/OPCs accessing Visa IntelliLink and ensure that cases are being followed up on in a timely manner.
3. Review and provide approval for requests and supporting documentation from the cardholder for requests for temporary ATM withdrawal, and/or temporary restricted or unrestricted card limit increase.
  - a. Temporarily modify cardholder accounts when requests for temporary ATM withdrawal and/or temporary restricted or unrestricted card limit increases are approved.
4. Approve online travel card pre-approvals and applications for processing
5. Review requests for cardholder account reinstatement and submit approved requests to Citibank.

6. Clear cardholders for separation from FDA once the cardholders are verified to have completed the requirements for closing an account.
7. Coordinate with the DTS Travel Compliance Team to close cardholder accounts that have not completed the required recertification training within 30 days of notification.

C. Responsibilities of the Level 4, 5, and 6 A/OPCs

1. Review and process travel card application pre-approval request via the online pre-approval tool.
  - a. Provide employees requesting a card with a copy of the DHHS and FDA-specific guidance on the use of the travel charge card and the employee's responsibilities when signing the travel charge card application.
2. Ensure that all cardholders complete the travel charge card refresher training every three years.
  - a. Request the temporary closure of cardholder accounts if the cardholder does not complete the travel charge card refresher training.
3. Complete travel charge card training and recertify every year.
  - a. Request temporary closure of cardholder accounts if the cardholder does not complete mandatory annual training.
  - b. Maintain a file of certificates of completion of training for all the A/OPCs one level lower (i.e. the Level 4 A/OPC maintains certificates for all Level 5/6 A/OPCs).
4. Provide an updated listing of the names of the Level 4 and lower A/OPCs and their alternate(s), with their mailing address and telephone numbers, to the Level 3 A/OPC on a quarterly basis.
5. Use the online reporting capabilities in CitiManager and Visa IntelliLink Compliance Manager to monitor for cardholder delinquency and potential travel charge card misuse and abuse.
  - a. Create and document monthly cases of abuse and misuse using Visa IntelliLink.

(1) Contact cardholder for justification for the charge (a valid

justification must include a receipt, related Travel Authorization, and related Travel Voucher.

(2) Upload required documentation in Visa IntelliLink case and return to DTS for review within 15 days of receipt (If a charge has been determined to be unauthorized (intentional and unintentional) the cardholder must retake TDY Success With the Federal Travel Charge Card (Course ID 00210977). The supervisor and cardholder must re-sign the FDA Zero Tolerance Policy Memo and the HHS Traveler's Agreement for Government Contractor-Issued Travel Charge Card Users. The cardholder must also include an explanation for the unauthorized use. The A/OPC will upload the documentation in the case and return to DTS for final review. DTS will review the case and based on the cardholder's explanation they will determine if the case moves forward to OIG for further review. Cases that have not been returned for review to the within 30 days will escalate back to DTS. Cases returned 3 times due to non-response will be reported to the OIG for non-compliance.

b. Maintain documentation of the reason for travel charge card suspension or cancellation.

c. Notify the Level 3 A/OPC of potential fraud.

d. Monitor cardholders' accounts for delinquency and request the temporary closure or cancellation of cards as outlined in Section 4.A.3.c of this guidance:

(1) Notify cardholders when they are delinquent (see Appendix F);

(2) Request travel charge cards be temporarily closed when accounts are 31 days past due;

(3) Request temporarily closed travel charge cards be reopened when cardholders are authorized to travel, and the undisputed balance has been paid in full.

6. Review requests and supporting documentation from cardholders for requests for temporary ATM withdrawal, and/or temporary restricted or unrestricted card limit increase.

7. Verify in CitiManager that the travel charge card has been canceled or the balance is \$0 when a cardholder leaves, retires or transfers to another Government agency.
8. Review and approve requests for cardholder account reinstatement and submit to the A/OPC one level higher (e.g., a Level 6 A/OPC will submit to a Level 5 A/OPC).

#### D. Responsibilities of the Cardholder's Supervisor

1. Issue written notice to those employees who are expected to travel of their need to apply for a travel charge card, and the mandatory use thereof.
2. Review and provide approval for requests and supporting documentation from cardholders for requests for temporary ATM withdrawal, and/or temporary restricted or unrestricted card limit increase.
3. Authorize cash advances in amounts in accordance with the DHHS Travel Policy Manual, Section 3.3 Travel Advances.
4. Review and provide authorization that travel is in support of the mission and is compliant with FDA and HHS policies.
5. When notified by the A/OPC of questionable or inappropriate charges, determine and communicate the appropriate disciplinary actions to the cardholder.
  - a. Maintain documentation of referrals to OC/OO/OHR and resolution of the referral.
  - b. Request that Level 3 A/OPC temporarily close or cancel the card if there is a pattern of inappropriate use or insufficient explanation for repeated delinquencies or suspected abuse/misuse.
6. Notify the Level 3 or lower A/OPC if a cardholder is no longer eligible to have a travel charge card.
7. Notify the Level 4 or lower A/OPC when a cardholder is transferring between offices within FDA.
8. Ensure the appropriate official signs an exit clearance or other form required to document cancellation of the card when a cardholder leaves FDA and that the departing cardholder understands his/her



responsibility to pay their proper travel charge card charges in full and on time.

#### E. Responsibilities of the Cardholder

1. Receive Supervisor concurrence to apply for a travel charge card if traveling one (1) or more times in a year
  - a. Complete the documents listed in Section 5.B of this guidance and forward the signed documents to the Level 4 or lower A/OPC.
2. Within 60 days of receiving card, cardholder must activate card. Appropriate actions may be taken pursuant to those policies if employee fails to activate the Government contractor-issued travel charge card within 60 days of receipt.
3. Complete the travel charge card refresher training every three (3) years.
4. Comply with and periodically review the card issuer agreement and all HHS and FDA guidance.
5. Use the travel charge card for all travel expenses associated with TDY travel unless an exemption applies.
  - a. Use the travel charge card only for authorized official Government travel expenses and be aware of what constitutes misuse; examples of misuse can be found in Section 5.C.3 of this guidance.
6. Ensure that the travel charge card and PIN are kept in a secure location.
7. Report lost or stolen travel charge cards immediately to Citibank and the Level 4 or lower A/OPC.
8. Obtain ATM advances for exempted expenses.
9. Prepare request and supporting documentation for temporary ATM withdrawal, and/or temporary restricted or unrestricted card limit increase.
10. Submit proper reimbursement vouchers within five (5) working days following completion of the trip or every 30 days if on continuous travel.
11. Pay travel charge card bills on time regardless of voucher

reimbursement status and use split disbursement so that the travel charge card will automatically be paid.

12. Take personal responsibility by following up with travel preparers, travel approving officials, the Office of Finance or similar office, and Citibank, as appropriate, to ensure timely travel voucher reimbursement as well as proper split-disbursement postings.
13. Respond to all A/OPC inquiries about travel charge card issues within one week.
14. Complete and submit requests for card account reinstatement.
15. Contact Citibank to dispute a charge within 60 days from the statement billing date of the disputed charge.
16. Notify the A/OPC when transferring between offices within FDA.
17. When leaving, retiring, or transferring to another Government agency, contact the A/OPC and Citibank to cancel travel charge card privileges and ensure the travel charge card account has a \$0 balance.
18. Document instances where the system did not support the traveler's efforts to obtain travel reimbursement in a timely manner. Examples of this would be if the ETS was not available for an extended period because of system issues such as year-end closing or if the traveler experienced excessive delays with document approvals.
19. Review and be familiar with what are allowable and unallowable charge card charges.
20. Review at least yearly the HHS Do's and Don't's Handbook.
21. Respond to A/OPC inquiries about travel charge card issues within one week.

## **7. Procedures.**

### **A. Training Requirements**

In order for participants in the travel charge card program to stay up to date on the latest rules and regulations, cardholders are required to complete a refresher training every three years. The Level 4 or lower A/OPCs are responsible for keeping documentation of all cardholders' certificates of completion of the travel charge card training and be able to furnish all

certificates upon request. Cardholders who do not complete the refresher training will have their card temporarily closed until they complete the training.

In addition, A/OPCs are required to complete the travel charge card refresher training annually. A/OPCs are responsible for keeping a copy of the certificates of completion the A/OPCs one level lower; for example, Level 4 A/OPCs must keep records of all of the Level 5 A/OPCs for whom they are responsible. A/OPCs who do not complete the refresher training will be temporarily closed and a notification will be sent to their supervisor requesting a replacement A/OPC.

#### B. Requests for Temporary ATM Withdrawal and/or Temporary Card Limit Increase

Under certain circumstances, cardholders may need to have their credit limit increased on their restricted or unrestricted card, require ATM access for their restricted card, and/or increase their ATM access limit on their unrestricted card. Any requests must be submitted using the memo in Appendix G.

Each trip requiring a request for temporary ATM withdrawal privileges and/or card limit increases must be submitted separately for approval. The memo should provide full details when possible, including the travel authorization number, purpose of the request, amount requested, expenses associated with the request, and dates of the travel.

Memos to request temporary ATM withdrawal and/or card limit increases must be reviewed and approved by the cardholder's supervisor and Level 4 A/OPC. Please consult your Level 4 or lower A/OPC for the appropriate time frames for submittal.

Once the request has been approved by the supervisor and Level 4 A/OPC, the request will be sent for final approval to the Level 3 A/OPC. Once the Level 3 A/OPC receives a request for temporary ATM withdrawal privileges and/or card limit increases, they will have 10 days to review and adjudicate on the request. Requests must be submitted to the Level 3 A/OPC prior to the travel occurring. If the request is approved, the Level 3 A/OPC will make the temporary adjustment for ATM withdrawal privileges and/or card limit increase to the cardholder's account for the duration of the trip.

#### C. Monitoring Cardholder Accounts

To identify potential cardholder misuse and abuse, delinquency, and accounts which need to be closed, Level 4 and lower A/OPCs should

review CitiManager reports and Visa IntelliLink Compliance Manager on a monthly basis in order to flag improper transactions or create cardholder cases with potential misuse.

When potential cardholder misuse is identified, the Level 4 or lower A/OPC should notify the cardholder and/or cardholder's supervisor of the issue(s) and request justification and/or documentation. Level 4 or lower A/OPCs should respond to the flagged case within 15 days to determine whether additional follow-up actions are necessary and when appropriate refer the case to the Level 3 A/OPCs for further review.

Level 3 A/OPCs will refer suspected cases of card misuse, abuse and/or fraud to Internal Affairs and HHS Office of Inspector General for further investigation. The cardholder account will be temporarily closed while it is being investigated. Please reference Section D. Reinstatement of Cardholder Accounts for card reinstatement.

#### 1. Monitoring Delinquency

Level 4 and lower A/OPCs should be reviewing reports and accounts on a monthly basis in CitiManager to identify cardholders with balances which are 25 or more days delinquent.

When card accounts are 31 days delinquent or greater, the CitiBank will suspend travel charge card until the undisputed balance has been paid in full. When card accounts become 96 days delinquent, the cardholder account will be automatically canceled by CitiBank. After 121 days, accounts are reported to the credit bureaus if delinquent balance is not paid. Late fees of 2.5% of the outstanding balance will begin to incur at 126 days past the statement billing date. Charge off occurs at 181 days past due. At 16, 25, 31, and 96 days past due the A/OPC will send a notice to the cardholder and copy the cardholder's supervisor, the Center/Office Chief Executive Officer, and the Director of the Office of Financial Management (OFM) Division of Travel Services (DTS).

For consistent notification procedures within FDA, use the delinquency notices in Appendix F of this guide.

#### 2. Misuse and Abuse

Level 4 and lower A/OPCs should monitor accounts for potential misuse and abuse as outlined in the FDA Zero Tolerance Policy and purchases from restricted MCC's. When potential misuse and abuse is detected by the Level 4 and lower A/OPC, the card will be temporarily

closed immediately while the issue is being investigated. If the cardholder is on active travel, the card should not be temporarily closed until after the travel has been completed.

Once the card has been temporarily closed, a non-supervisory Level 4 or lower A/OPC will send notice to the cardholder to request that documentation be provided. The cardholder should make every effort to respond to requests for justification and documentation in a timely manner. If misuse or abuse is identified after reviewing documentation provided by the cardholder, a non-supervisory Level 4 or lower A/OPC will reach out to the cardholder and the cardholder's supervisor with a memo to outline the issue and steps required for remediating the issue.

As outlined in the Zero Tolerance Policy, the cardholder's supervisor may impose appropriate corrective actions, including:

- a. Requiring the cardholder retake the travel charge card training;
- b. Issuing a letter of counseling to the cardholder;
- c. Temporarily closed or cancel cardholder accounts permanently;
- d. Imposing additional disciplinary actions deemed appropriate by the Agency.

For consistent notification procedures within FDA, the non-supervisory Level 4 and lower A/OPCs should use the inappropriate use notice found in Appendix D to notify travelers of questionable charges incurred while in travel status or the unauthorized use notice found in Appendix E to notify travelers of charges incurred while not in travel status.

In cases of potential fraud, the OIG, Citibank, and OFM should be notified.

#### D. Reinstatement of Accounts by Citibank

If a cardholder has had their account cancelled by Citibank for delinquency, a request for card reinstatement requires 12-month waiting period after account closure or payment of principal amount and subsequent delinquency fees. Requests for card reinstatement requires Level 3 A/OPC review and approval. The cardholder account must meet all of the criteria outlined in Section 5 D.3 of this guidance. Accounts that are charged off are not eligible for reinstatement.

If the Level 3 and all lower A/OPCs approve the reinstatement request, it will be submitted to Citibank for approval. Citibank will then make the final decision whether to reinstate the cardholder account.

Cardholder accounts which have been temporarily closed or cancelled by Citibank due to misuse and abuse will be cancelled indefinitely with no period for reapplication and/or account reinstatement.

**E. Closing an Account**

When leaving the Federal government, retiring, or transferring to another Federal agency, the cardholder is responsible for notifying their A/OPC and Citibank to close their account. Cardholders must ensure that their account has a \$0 balance before leaving the FDA. If the cardholder has a credit due to FDA, the cardholder must send a check to FDA. If a credit is due to the cardholder, then the cardholder must request that Citibank send a check to the cardholder. Cardholders then have the option to dispose of the card or turn it in to their A/OPC or supervisor to be disposed of.

The Level 3 or lower A/OPC should verify that cardholders have closed their account prior to leaving FDA. Level 3 or lower A/OPCs should also ensure that a cardholder’s travel charge card has a \$0 balance before clearing the cardholder from separating from FDA.

**8. Effective Date.**

This guide was signed by Sahra I. Torres-Rivera, Director – Office of Financial Management, and is effective 05/31/2022.

**9. Document History – SMG 2343.1, “Government Travel Charge Card Program and ATM Advance Program”**

Status (I, R, C)	Date Approved	Location of Change	Contact	Approving Official
Initial	05/04/2010	N/A	OC/OA/OFO/OFM	William Collinson, Director, OFM
Revision	06/28/2016	N/A	OO/OFBA/OFO/OFM	Peter Kelchner, Acting Director, OFM
Change	01/02/2020	Update the URLs	OO/OFBA/OFM/DTS	Evan Chiverton, Director, Division of Travel Services
Revision	05/23/2022	N/A	OC/OO/OFBAP/OFM	Sahra I. Torres-Rivera, Director, Office of Financial Management

**APPENDIX A – HHS Traveler’s Agreement for Government Contractor-**

## **Issued Travel Charge Card Users**

Here is the URL for the HHS Traveler's Agreement for Government Contractor-Issued Travel Charge Card Users:

<http://fdswv25011/Inside/downloads/Administrative/Travel/GovernmentTravelCard/HHS%20Travelers%20Agreement.pdf>

## **APPENDIX B – FDA Zero Tolerance Policy Memo**

Here is the URL for the FDA Zero Tolerance Policy Memo:

<http://fdswv25011/Inside/downloads/Administrative/Travel/GovernmentTravelCard/Blank%20Zero%20Tolerance%20Policy%20Memo.pdf>

## **APPENDIX C – Citibank Disputes Process – Cardholder Edition**

Here is the URL for the Citibank Disputes Process – Cardholder Edition:

<http://fdswv25011/Inside/downloads/Administrative/Travel/GovernmentTravelCard/Citibank%20Disputes%20Process%20-%20June%202019%20-%20Cardholders.pdf>

## **APPENDIX D – Government Travel Charge Card Inappropriate Use Notices**

Here is the URL for the Government Travel Charge Card Inappropriate Use Notices:

<http://fdswv25011/Inside/downloads/Administrative/Travel/GovernmentTravelCard/Inappropriate%20Use%20Notice%20.docx>

## **APPENDIX E – Government Travel Charge Card Unauthorized Use Notices**

Here is the URL for the Government Travel Charge Card Unauthorized Use Notices:

<http://fdswv25011/Inside/downloads/Administrative/Travel/GovernmentTravelCard/UNAUTHORIZED%20USE%20NOTICES-UPDATED.docx>

## **APPENDIX F – Government Travel Charge Card Delinquency Notices**

Here is the URL for the Government Travel Charge Card Delinquency Notices:

<http://fdswv25011/Inside/downloads/Administrative/Travel/GovernmentTravelCard/Late%20Fee%20Notification.docx>

## **APPENDIX G – Temporary ATM Withdrawal and Temporary Restricted Card HHS Travel Card Increase Memo**

Here is the URL for the Temporary ATM Withdrawal and Temporary Restricted Card HHS Travel Card Increase Memo:

<http://fdswv25011/Inside/downloads/Administrative/Travel/GovernmentTravelCard/Blank%20Increase%20Memo.pdf>

#### **APPENDIX H. CitiBank Cardholder Agreement**

Here is the URL for the CitiBank Cardholder Agreement:

<https://www.citibank.com/tts/solutions/commercial-cards/assets/docs/govt/Cardholder-Agreement-DOD.pdf>

#### **APPENDIX I: Travel Card Do's and Don'ts**

Here is the URL for the Travel Card Do's and Don'ts:

<http://fdswv25011/Inside/downloads/Administrative/Travel/GovernmentTravelCard/FDA%20Travel%20Card%20Do%27s%20and%20Don%27ts.pdf>